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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

All Actions

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ANNE B. SHAVER IN
SUPPORT OF PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR CLASS
CERTIFICATION, AND MEMORANDUM
OF LAW IN SUPPORT**

Date: January 17, 2013
Time: 1:30 pm
Courtroom: 8, 4th Floor
Judge: Honorable Lucy H. Koh

I, Anne B. Shaver, declare:

1. I am an associate in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, a member of the State Bar of California, and am admitted to practice before the United States

1 District Court for the Northern District of California. I am one of the counsel for the Plaintiffs in
2 this action. I make this declaration based on my own personal knowledge. If called upon to
3 testify, I could and would testify competently to the truth of the matters stated herein.

4 **Deposition Testimony**

5 2. Attached hereto as Exhibit 1 is a true and correct copy of transcript excerpts from
6 the Rule 30(b)(6) deposition of Apple witness Mark Bentley, dated August 23, 2012.

7 3. Attached hereto as Exhibit 2 is a true and correct copy of transcript excerpts from
8 the Rule 30(b)(6) deposition of Google witness Arnon Geshuri, dated August 17, 2012.

9 4. Attached hereto as Exhibit 3 is a true and correct copy of transcript excerpts from
10 the Rule 30(b)(6) deposition of Pixar witness Lori McAdams, dated August 2, 2012.

11 5. Attached hereto as Exhibit 4 is a true and correct copy of transcript excerpts from
12 the Rule 30(b)(6) deposition of Adobe witness Donna Morris, dated August 21, 2012.

13 6. Attached hereto as Exhibit 5 is a true and correct copy of transcript excerpts from
14 the Rule 30(b)(6) deposition of Pixar witness Jim Morris, dated August 3, 2012.

15 **Declarations**

16 7. Attached hereto as Exhibit 6 is a true and correct copy of a declaration from
17 Plaintiff and Class Member Michael Devine.

18 8. Attached hereto as Exhibit 7 is a true and correct copy of a declaration from
19 Plaintiff and Class Member Mark Fichtner.

20 9. Attached hereto as Exhibit 8 is a true and correct copy of a declaration from
21 Plaintiff and Class Member Siddharth Hariharan.

22 10. Attached hereto as Exhibit 9 is a true and correct copy of a declaration from
23 Plaintiff and Class Member Brandon Marshall.

24 11. Attached hereto as Exhibit 10 is a true and correct copy of a declaration from
25 Plaintiff and Class Member Daniel Stover.

26 **Documents Produced by Defendant Adobe**

27 12. Attached hereto as Exhibit 11 is a true and correct copy of ADOBE_000421-22.

28 13. Attached hereto as Exhibit 12 is a true and correct copy of ADOBE_000853-54.

- 1 14. Attached hereto as Exhibit 13 is a true and correct copy of ADOBE_001092-93.
2 15. Attached hereto as Exhibit 14 is a true and correct copy of ADOBE_002773-88.
3 16. Attached hereto as Exhibit 15 is a true and correct copy of ADOBE_005950-67.
4 17. Attached hereto as Exhibit 16 is a true and correct copy of ADOBE_007186-87.

5 **Documents Produced by Defendant Apple, Inc.**

- 6 18. Attached hereto as Exhibit 17 is a true and correct copy of 231APPLE002140.
7 19. Attached hereto as Exhibit 18 is a true and correct copy of 231APPLE002143-44.
8 20. Attached hereto as Exhibit 19 is a true and correct copy of 231APPLE002145.
9 21. Attached hereto as Exhibit 20 is a true and correct copy of 231APPLE002149.
10 22. Attached hereto as Exhibit 21 is a true and correct copy of 231APPLE002217-19.
11 23. Attached hereto as Exhibit 22 is a true and correct copy of 231APPLE041661-62.
12 24. Attached hereto as Exhibit 23 is a true and correct copy of 231APPLE073139.

13 **Documents Produced by Defendant Google**

- 14 25. Attached hereto as Exhibit 24 is a true and correct copy of GOOG-HIGH TECH-
15 00000107-109.
16 26. Attached hereto as Exhibit 25 is a true and correct copy of GOOG-HIGH-TECH-
17 00007574-76.
18 27. Attached hereto as Exhibit 26 is a true and correct copy of GOOG-HIGH TECH-
19 00007715-18.
20 28. Attached hereto as Exhibit 27 is a true and correct copy of GOOG-HIGH TECH-
21 00007725-26.
22 29. Attached hereto as Exhibit 28 is a true and correct copy of GOOG-HIGH TECH-
23 00007731-32.
24 30. Attached hereto as Exhibit 29 is a true and correct copy of GOOG-HIGH TECH-
25 00008283-84.
26 31. Attached hereto as Exhibit 30 is a true and correct copy of GOOG-HIGH-TECH-
27 00009391.
28 32. Attached hereto as Exhibit 31 is a true and correct copy of GOOG-HIGH TECH-

1 00009764.

2 33. Attached hereto as Exhibit 32 is a true and correct copy of GOOG-HIGH TECH-
3 00023106-07.

4 34. Attached hereto as Exhibit 33 is a true and correct copy of GOOG-HIGH TECH
5 00023132.

6 35. Attached hereto as Exhibit 34 is a true and correct copy of GOOG-HIGH TECH-
7 00023206-12.

8 36. Attached hereto as Exhibit 35 is a true and correct copy of GOOG-HIGH TECH-
9 00024458-59.

10 37. Attached hereto as Exhibit 36 is a true and correct copy of GOOG-HIGH TECH-
11 00053679-81.

12 38. Attached hereto as Exhibit 37 is a true and correct copy of GOOG-HIGH-TECH-
13 00056790.

14 39. Attached hereto as Exhibit 38 is a true and correct copy of GOOG-HIGH TECH-
15 00056879.

16 40. Attached hereto as Exhibit 39 is a true and correct copy of GOOG-HIGH TECH-
17 00057458-60.

18 41. Attached hereto as Exhibit 40 is a true and correct copy of GOOG-HIGH TECH-
19 00058235-36.

20 42. Attached hereto as Exhibit 41 is a true and correct copy of GOOG-HIGH-TECH-
21 0058410-12.

22 43. Attached hereto as Exhibit 42 is a true and correct copy of GOOG-HIGH TECH-
23 00056840-43.

24 44. Attached hereto as Exhibit 43 is a true and correct copy of GOOG-HIGH-TECH-
25 00192980-87.

26 45. Attached hereto as Exhibit 44 is a true and correct copy of GOOG-HIGH-TECH-
27 00193305-08.

28 46. Attached hereto as Exhibit 45 is a true and correct copy of GOOG-HIGH-TECH-

00193360-67.

47. Attached hereto as Exhibit 46 is a true and correct copy of GOOG-HIGH-TECH-00193377-82.

48. Attached hereto as Exhibit 47 is a true and correct copy of GOOG-HIGH-TECH-00194984-85.

49. Attached hereto as Exhibit 48 is a true and correct copy of GOOG-HIGH-TECH-00196204-06.

50. Attached hereto as Exhibit 49 is a true and correct copy of GOOG-HIGH-TECH-00196286-87.

Documents Produced by Defendant Intel

51. Attached hereto as Exhibit 50 is a true and correct copy of 76526DOC0000004.

52. Attached hereto as Exhibit 51 is a true and correct copy of 76526DOC0000007.

53. Attached hereto as Exhibit 52 is a true and correct copy of 76526DOC000011-14.

54. Attached hereto as Exhibit 53 is a true and correct copy of 76577DOC000464-66.

55. Attached hereto as Exhibit 54 is a true and correct copy of 76579DOC015618-837.

56. Attached hereto as Exhibit 55 is a true and correct copy of 76606DOC000420-22.

57. Attached hereto as Exhibit 56 is a true and correct copy of 76614DOC010212.

58. Attached hereto as Exhibit 57 is a true and correct copy of 76616DOC002617.

Documents Produced by Defendant Intuit

59. Attached hereto as Exhibit 58 is a true and correct copy of INTUIT_000013-15.

60. Attached hereto as Exhibit 59 is a true and correct copy of INTUIT_039098-100.

Documents Produced by Defendant LucasFilm

61. Attached hereto as Exhibit 60 is a true and correct copy of LUCAS00013507.

Documents Produced by Defendant Pixar

62. Attached hereto as Exhibit 61 is a true and correct copy of PIX00000229.

63. Attached hereto as Exhibit 62 is a true and correct copy of PIX00006025.

64. Attached hereto as Exhibit 63 is a true and correct copy of PIX00002262-24.

65. Attached hereto as Exhibit 64 is a true and correct copy of PIX0003600.

66. Attached hereto as Exhibit 65 is a true and correct copy of PIX00004051-2.

67. Attached hereto as Exhibit 66 is a true and correct copy of PIX00004883.

68. Attached hereto as Exhibit 67 is a true and correct copy of PIX00006023.

69. Attached hereto as Exhibit 68 is a true and correct copy of PIX00006025.

70. Attached hereto as Exhibit 69 is a true and correct copy of PIX00009416.

71. Attached hereto as Exhibit 70 is a true and correct copy of PIX00015306-08.

Department of Justice Competitive Impact Statement

72. Attached hereto as Exhibit 71 is a true and correct copy of the Department of Justice's Competitive Impact Statement in *United States v. Adobe Systems Inc., et al.*, No. 10-cv-1629-RBW (D.D.C. Sept. 24, 2010) (Dkt. No. 2).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed October 1, 2012, in San Francisco, California.

/s/ Anne B. Shaver

Anne B. Shaver